

1 RICHARD E. DONALDSON, ESQ.
Bar # 1095
2 4030 South Jones Blvd.
P.O. Box 30697
3 Las Vegas, Nevada 89173-8801
☎ (702) 382-6370 ☎ Fax (702) 382-0836
4 Attorney for Plaintiff

5
6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 * * * * *

9
10 PAUL MISKEY

11 Plaintiff,

12 vs.

13 NANCY A. BERRYHILL, ACTING
14 COMMISSIONER OF SOCIAL
SECURITY,

15 Defendant.
16

Case No. 2:19-cv-00027-JCM-VCF

17
18 PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF
19 TIME TO FILE A MOTION FOR REVERSAL AND/OR REMAND
20 (First Request)

21 Plaintiff, RANDY G WILLIAMS by and through his attorney of record, RICHARD
22 E. DONALDSON, ESQ., respectfully requests an extension of time of an additional thirty
23 (30) days, to and including Monday June 10, 2019, in which to file a Motion for Reversal
24 and/or Remand. Mr. Miskey seeks judicial review of the Commissioner's decisions that
25 Social Security overpaid and even if it did, recoupment would be against equity and good
26 conscience. 42 U.S.C. §404(b) and 20 C.F.R. § 404.506.

27 This request is necessary so that the Plaintiff can finish the summary, research and
28 writing, which has taken much longer than anticipated. At the present time, Plaintiff's
deadline to file the Motion for Reversal and/or Remand is three days from today, May 10,

1 2019, and counsel will undoubtedly be unable to finish the brief by Monday.

2 Counsel has spoken to Special Assistant United States Attorney from the Office of
3 General Counsel Chantal Jenkins who stated she had no objection to granting this
4 extension.

5 RESPECTFULLY SUBMITTED this 10TH day of May, 2019.

6 RICHARD E. DONALDSON, ESQ.,CHTD.

7
8 By: /s/ Richard E. Donaldson
9 RICHARD E. DONALDSON, ESQ.
Nevada Bar No. 1095
Attorney for Plaintiff

10
11
12 IT IS SO ORDERED:

13 
14 UNITED STATES MAGISTRATE JUDGE

15 DATED: 5-13-2019
16
17
18
19
20
21
22
23
24
25
26
27
28